

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Lori Saroya,

Court File No. 24-CV-110 (DWF/DTS)

Plaintiff,

v.

CAIR Foundation, Inc. d/b/a
Council on American-Islamic Relations &
CAIR,

**DECLARATION OF
EDWARD MITCHELL**

Defendant.

Pursuant to 28 U.S.C. § 1746, Edward Mitchell declares, as follows:

1. My name is Edward Mitchell. I have personal knowledge of the facts stated in this declaration.
2. I am employed by CAIR Foundation, Inc. (“CAIR”), as National Deputy Executive Director. I have held this role since March 2020.
3. I reside in Georgia, and have lived in Georgia at all times since 1995, except for the period during which I lived in Washington, D.C. and Maryland while I attended law school at Georgetown University Law Center.
4. I have only traveled to Minnesota once in my lifetime, in 2008, for a national mock trial competition for college students.
5. I do not own any property in Minnesota.
6. In my role at CAIR, my work is not, and has never been, focused specifically on Minnesota.

7. The entirety of my involvement with respect to CAIR's 2022 statement, which Plaintiff Lori Saroya has referred to as a "press release" and which is attached as Exhibit 4 to her proposed Amended Complaint (the "Community Update"), was in my professional role at CAIR.

8. Specifically, to the extent I was at all involved in drafting, revising, approving, sharing, or otherwise disseminating the Community Update, I did so solely on behalf of CAIR. I did not do so on my own behalf and did not do so in my personal or individual capacity.

9. I had no intent that the Community Update would be shared with any particular person or entity in Minnesota. CAIR did not distribute the Community Update to its media outlet list or to CAIR's community email list. The Community Update was posted in a place on the CAIR website such that only those with the link or those actively searching for the statement or a related topic using keywords would find it, and it was not specifically targeted to Minnesota or Minnesota residents.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: December 19, 2024 By: /s/ Edward Mitchell

Edward Mitchell